



**HEALY**LLC

154 Grand Street  
New York, NY 10013  
T: 212.810.0377  
F: 212.810.7036  
www.healylex.com

Valeria Calafiore Healy  
vch@healylex.com

**By ECF and Hand Delivery**

July 18, 2016

The Honorable Donna M. Ryu  
United States District Court  
Northern District of California  
1301 Clay Street, Courtroom 4  
Oakland, California 94612

Re: *Loop AI Labs Inc. v. Anna Gatti et. al.*,  
**3:15-cv-00798-HSG-DMR – Statements Submitted Pursuant to Order 826**

Dear Judge Ryu:

I write on behalf of Loop AI Labs Inc. (“Loop AI”), regarding the Statement that Loop AI submitted this morning at Docket 834, pursuant to Your Honor’s Order at Docket 826 (“Order 826”). Loop AI understood Order 826 to require Loop AI to identify only those documents listed by Almaxwave USA (or the Almaxviva Defendants) in Exhibit A filed at 815-1 that were “cited in support of [Loop AI’s] *opposition to the Almaxviva Defendants’ motion for summary judgment.*” Dkt. 826 at 1:14-15 (emphasis added).

Based on this understanding, Loop AI submitted Amended Exhibit A, filed at Dkt. 834-2, and highlighted in yellow for quick identification only those rows listing a document that was cited by Loop AI in its Opposition to the Almaxviva Defendants Motion for Summary Judgment. *See id.* and Dkt. 834 at 1. Loop AI did not highlight in Amended Exhibit A documents that Loop AI may have cited in its Oppositions to the motions for summary judgment filed by the other defendants.

The Almaxviva Defendants, however, have now submitted a revised Statement at Dkt. 835, purporting to identify documents listed in their prior Exhibit A that have been cited by Loop AI in opposition to *all* motions for summary judgment, regardless of who the movant was. To the extent Loop AI misunderstood Order 826, Loop AI respectfully requests the opportunity to amend it and to respond to the new statements presented by the Almaxviva Defendants.

Respectfully submitted,

Valeria Calafiore Healy